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July 24, 2002

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TWB-204  
Washington, DC 20554

Re: Application by Qwest Communications International, Inc. for Authorization to Provide In-Region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota, Docket No. 02-148

Dear Ms. Dortch:

Today, Richard Rocchini, Michael Lieberman, Christopher Shenk and the undersigned, all representing AT&T, met with Douglas Galbi, Aaron Goldschmidt, Nese Guendelsberger, Jennifer McKee, Steve Morris, Kathy O'Neill, Deena Shetler and Harry Wingo of the Commission's staff. Also representing AT&T and participating by conference call were Robert Mercer, Tom Weiss, Dean Fassett, Richard Chandler, Natalie Baker, Arleen Starr and Douglas Denney. During this meeting, AT&T reiterated its arguments that Qwest's recurring and non-recurring UNE rates are substantially inflated by clear TELRIC errors and demonstrated that, despite Qwest's recent acknowledgement of its error with respect to sales of exchanges, other problems in Qwest's benchmarking analysis previously identified by AT&T remain. AT&T also discussed the various components of its margin analysis and demonstrated that the analysis presented by AT&T in this proceeding is fully documented. The attached handouts were distributed during this discussion. Responses to questions from staff and the issues raised in Qwest's July 22, 2002 ex parte will be incorporated in the reply comments AT&T will file on July 29, 2002.

One electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in cursive script that reads "Amy L. Alvarez".

cc: Michael Carowitz  
Elizabeth Yockus  
Gary Remondino  
Yaron Dori

**SGAT Exhibit A  
Colorado\***

	Recurring	Non-Recurring	Notes
Busy Line Verify, per call	\$0.72		
Busy Line Interrupt	\$0.87		
<b>10.6.2 Option B – Per Operator Work Second and Computer Handled Calls</b>			
Operator Handled, per Operator Work Second	\$0.018100		
Machine Handled, per Call	\$0.13		
Call Branding, Set-Up & Recording		\$10,500.00	
Loading Brand/Per Switch		\$175.00	
<b>10.7 Access to Poles, Ducts, Conduits and Rights of Way</b>			
10.7.1 Pole Inquiry Fee, per Mile		\$322.26	
10.7.2 Innerduct Inquiry Fee, per Mile		\$387.37	
10.7.3 ROW Inquiry Fee		\$143.18	1
10.7.4 ROW Doc Prep Fee		\$143.18	1
10.7.5 Field Verification Fee, Poles		\$35.69	
10.7.6 Field Verification Fee, Manholes		\$142.67	
10.7.7 Planner Verification, Per Manhole		\$15.97	1
10.7.8 Manhole Verification Inspector Per Manhole		\$286.37	1
10.7.9 Manhole Make-Ready Inspector, per Manhole		\$429.56	1
10.7.1C Pole Attachment Fee, per Foot, per Year			
Urban			
2002	\$2.21		2
2003	\$2.39		2
2004	\$2.58		2
2005	\$2.77		2
Non-Urban			
2002	\$2.77		2
2003	\$3.24		2
2004	\$3.71		2
2005	\$4.18		2
10.7.11 Innerduct Occupancy Fee, per Foot, per Year	\$0.339		2
10.7.12 Access Agreement Consideration		\$10.00	8
10.7.13 Make Ready		ICB	3
<b>12.0 Operational Support Systems</b>			
12.1 Development and Enhancements, per Order		No charge at this time	
12.2 Ongoing Maintenance, per Order	No charge at this time		
12.3 Daily Usage Record File, per Record	\$0.000886		
12.4 Trouble Isolation Charge		See MSC Charges	
<b>17.0 Bona Fide Request Process</b>			
17.1 Processing Fee		\$1,055.50	

**NOTES:**

\* Unless otherwise indicated, rates shown are those approved by the Commission in Dockets 96S-331T & 99A-577T. The Collocation Space Reservation Fee (8.1.7 above) was ordered in Docket 97I-198T, Decision R01-818.

- [1] Price not yet approved by the Commission.
- [2] Rate Per FCC Guidelines.
- [3] ICB Individual Case Basis.
- [4] Recurring rate applies when the NID is purchased separately.
- [5] Regional Rate.
- [6] A special request is a request by the customer to perform something that is technically feasible but the process and pricing are not yet in place.
- [7] Rate has been ordered in a different section and is being used due to the similar characteristics of the element. This rate would be replaced when a rate is developed or ordered for this product.
- [8] Consensus rate as result of 271 workshops.
- [9] Qwest will utilize the Commission TELRIC ordered rates for this element. However, Qwest reserves its right to implement market based prices sometime in the future pursuant to CC Docket No. 96-98, paragraphs 278-287.

**Exhibit A**  
**Iowa\***

		Recurring	Nonrecurring	Notes
<b>12.0 Operational Support Systems</b>				
<b>12.1 Development and Enhancements, per Order</b>			Under Development	
<b>12.2 Ongoing Maintenance, per Order</b>		\$1.02		
<b>12.3 Daily Usage Record File, per Record</b>		\$0.000948		
<b>12.4 Trouble Isolation Charge</b>			See MSC Charges	
<b>12.5 Transaction fee, per order</b>		\$0.35650		
<b>17.0 Bona Fide Request Process</b>				
<b>17.1 Processing Fee</b>			\$2,468.97	

**NOTES:**

- \* Unless otherwise indicated, all rates are pursuant to Qwest Local Wireline Network Interconnection and Service Resale Tariff.
- # Denotes voluntary rate reduction.

- [1] Rates not address in Cost Docket (TELRIC)
- [2] Market-based rates.
- [3] ICB, Individual Case Basis pricing.
- [4] Regional TELRIC bases where required.
- [5] Rates per FCC Guidelines.
- [6] Reserved for future use.
- [7] A special request is a request by the customer to perform something that is technically feasible but the process and pricing are not yet in place.
- [8] Iowa is a bill and keep state.

**Exhibit A  
North Dakota\***

	Recurring	Nonrecurring	Notes
<b>10.4 Directory Assistance, Facility Based Providers</b>			
10.4.1 Local Directory Assistance, Per Call	\$0.34		
10.4.2 National Directory Assistance, per Call	\$0.36		
10.4.3 Call Branding, Set-Up and Recording		\$10,500.00	2
10.4.4 Loading Brand /Per Switch		\$175.00	2
10.4.5 Call Completion Link, per Call	\$0.09		2
<b>10.5 Directory Assistance List Information</b>			
10.5.1 Initial Database Load, per Listing	\$0.0250		2
10.5.2 Reload of Database, per Listing	\$0.0200		2
10.5.3 Daily Updates, per Listing	\$0.0500		2
10.5.4 One-time Set-Up Fee	\$77.44		1
<b>10.5.5 Media Charges for File Delivery</b>			
Electronic Transmission	\$0.0020		2
Tapes (charges only apply if this is selected as the normal delivery medium for daily updates) (per tape)	\$30.00		
Shipping Charges (for tape delivery)		ICB	3
<b>10.6 Toll and Assistance Operator Services, Facility Based Providers.</b>			
10.6.1 Option A -- Per Message			
Operator Handled Calling Card	\$1.45		2
Machine Handled Calling Card	\$0.50		2
Station Call	\$1.50		2
Person Call	\$3.50		2
Connect to Directory Assistance	\$0.75		2
Busy Line Verify, per Call	\$0.72		
Busy Line Interrupt	\$0.87		
Operator Assistance, per Call	\$0.50		2
<b>10.6.2 Option B -- Per Operator Work Second and Computer Handled Calls</b>			
Operator Handled, per Operator Work Second	\$0.0280		2
Machine Handled, per Call	\$0.2500	\$10,500.00	2
Call Branding, Set-Up & Recording		\$175.00	2
Loading Brand/Per Switch			
<b>10.7 Access to Poles, Ducts, Conduits and Rights of Way</b>			
10.7.1 Pole Inquiry Fee, per Mile		\$336.35	1
10.7.2 Interduct Inquiry Fee, per Mile		\$404.31	1
10.7.3 ROW Inquiry Fee		\$149.43	1
10.7.4 ROW/Doc Prep Fee		\$149.43	1
10.7.5 Field Verification Fee, per Pole		\$37.36	1
10.7.6 Field Verification Fee, per Manhole		\$485.63	1
10.7.7 Planner Verification, Per Manhole		\$16.68	1
10.7.8 Manhole Verification Inspector Per Manhole		\$298.85	1
10.7.9 Manhole Make-Ready Inspector, per Manhole		\$448.28	1
10.7.10 Pole Attachment Fee, per Foot, per Year			
Urban			
2002	\$1.34		4
2003	\$1.46		4
2004	\$1.57		4
2005	\$1.69		4
Non-Urban			
2002	\$1.69		4
2003	\$1.97		4
2004	\$2.26		4
2005	\$2.54		4
10.7.11 Interduct Occupancy Fee, per Foot, per Year	\$0.33		4
10.7.12 Access Agreement Consideration		\$10.00	2
10.7.13 Make Ready		ICB	3
<b>12.0 Operational Support Systems</b>			
12.1 Development and Enhancements, per Order		Under Development	
12.2 Ongoing Maintenance, per Order	\$3.48		1
12.3 Daily Usage Record File, per Record	\$0.0011		1
12.4 Trouble Isolation Charges		See MSC Charges	
17.0 Bona Fide Request Process			
17.1 Processing Fee		\$2,510.29	1

**NOTES:**

\* Unless otherwise indicated, all rates are pursuant to the U S WEST and AT&T Interconnection Agreement approved by the North Dakota Public Utilities Commission in Docket Number PU-453-96-497, effective June 23, 1997.

**Exhibit A  
NorthDakota\***

		Recurring	Nonrecurring	Notes
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# Denotes voluntary rate reduction.

[1] Rates not addressed in AT&T Arbitration. (TELRIC)

[2] Market-based rates.

[3] ICB, Individual Case Basis pricing.

[4] Rates per FCC Guidelines.

[5] Intentionally Left Blank

[6] Estimated TELRIC.

[7] Deaveraged rates approved per Stipulated Agreement in Docket PU-314-97-12. Below is a breakdown of wire center per zone:

Zone 1- Fargo, Grand Forks, Bismarck, West Fargo, Jamestown, Williston, Wahpeton, Mandan, Dickinson.

Zone 2- Valley City, Grafton, Mayville, Larimore, Lisbon, Casselton

Zone 3- Emerado, Pembina, Hatton, Belfield, Minto, Watford City, Hillsboro, Kindred, Thompson, Northwood, Gwinner, Reynolds, Gardner, Marvel, Fairmount, Wyndmere, Leonard, Alexander

[8] Regional TELRIC

[9] A special request is a request by the customer to perform something that is technically feasible but the process and pricing are not yet in place.

[10] Rate agreed to with staff pending resolution of wire cable termination policy review.

[11] When distribution is purchased only for the purpose of campus wire, no recurring or nonrecurring charges will be assessed. This does not include collocation charges or FCP placement.

**Exhibit A  
Nebraska\***

		Recurring	Nonrecurring	Notes
10.5.2	Reload of Database, per Listing	\$0.02		2
10.5.3	Daily Updates, per Listing	\$0.05		2
10.5.4	One-time Set-Up Fee	\$81.42		2
10.5.5	Media Charges for File Delivery			
	Electronic Transmission	\$0.0020		2
	Tapes (charges only apply if this is selected as the normal delivery)	\$30.00		2
	Shipping Charges (for tape delivery)		ICB	3
<b>10.6</b>	<b>Toll and Assistance Operator Services, Facility Based Providers,</b>			
10.6.1	<b>Option A – Per Message</b>			
	Operator Handled Calling Card	\$1.45		2
	Machine Handled Calling Card	\$0.60		2
	Station Call	\$1.50		2
	Person Call	\$3.50		2
	Connect to Directory Assistance	\$0.75		2
	Busy Line Verify, per Call	\$1.95		2
	Busy Line Interrupt	\$2.05		2
	Operator Assistance, per Call	\$0.50		2
10.6.2	<b>Option B – Per Operator Work Second and Computer Handled Calls</b>			
	Operator Handled, per Operator Work Second	\$0.028		2
	Machine Handled, per Call	\$0.250		2
	Call Branding, Set-Up & Recording		\$10,500.00	2
	Loading Brand/Per Switch		\$175.00	2
<b>10.7</b>	<b>Access to Poles, Ducts, Conduits and Rights of Way</b>			
10.7.1	Pole Inquiry Fee, per Mile		\$304.67	
10.7.2	Innerduct Inquiry Fee, per Mile		\$366.22	
10.7.3	ROW Inquiry Fee		\$135.35	
10.7.4	ROW Doc Prep Fee		\$135.35	
10.7.5	Field Verification Fee, per Pole		\$33.84	
10.7.6	Field Verification Fee, per Manhole		\$439.88	
10.7.7	Planner Verification, Per Manhole		\$15.09	
10.7.8	Manhole Verification Inspector Per Manhole		\$270.70	
10.7.9	Manhole Make-Ready Inspector, per Manhole		\$406.04	
10.7.10	Pole Attachment Fee, per Foot, per Year	\$2.73		4
10.7.11	Innerduct Occupancy Fee, per Foot, per Year	\$0.28		4
10.7.12	Access Agreement Consideration		\$10.00	2
10.7.13	Make Ready		ICB	3
<b>12.0</b>	<b>Operational Support Systems</b>			
12.1	<b>Development and Enhancements, per Order</b>		\$14.65	1
12.2	<b>Ongoing Maintenance, per Order</b>	\$2.52		1
12.3	<b>Daily Usage Record File, per Record</b>	\$0.0008290		
12.5	<b>Trouble Isolation Charge</b>		See MSC Charges	
<b>17.0</b>	<b>Bona Fide Request Process</b>			
17.1	<b>Processing Fee</b>		\$2,273.80	

**NOTES:**

- \* Unless otherwise indicated, all rates are pursuant Commission Order in Cost Docket C-2516.  
# First rate is rate ordered in Cost Docket C-2516. Second rate includes a voluntary price reduction that is proposed by Qwest. All carriers will receive the voluntarily reduced rates unless they explicitly request the higher Ordered rates.

- [1] Rates not proposed in Cost Docket C-2516, TELRIC based.  
[2] Market Based Rates  
[3] Individual Case Basis- ICB  
[4] Rates based on FCC guidelines.  
[5] Regional TELRIC based where required.  
[6] Qwest has agreed to a bill and keep arrangement for EICT, pursuant to 271 workshops.